

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

LA UNION DEL PUEBLO ENTERO, et al <i>Plaintiffs,</i>	§	
	§	
	§	
v.	§	Case No.: 1:21-CV-0780-XR,
	§	consolidated with 5:21-CV-0844-XR
GREGORY W ABBOTT, et al, <i>Defendants.</i>	§	
	§	
	§	
	§	

**ANSWER OF DEFENDANT ISABEL LONGORIA, IN HER OFFICIAL CAPACITY AS
THE HARRIS COUNTY ELECTIONS ADMINISTRATOR, TO OCA-GREATER
HOUSTON, ET. AL'S AMENDED COMPLAINT**

Defendant ISABEL LONGORIA, in her official capacity as the Harris County Elections Administrator (“Defendant”) now files her Answer to the Amended Complaint (Dkt. 137) of Plaintiffs OCA-Greater Houston, League of Women Voters Texas, REVUP-Texas, Texas Organizing Project, and Workers Defense Action Fund (“Plaintiffs”) and would respectfully show this Court as follows. Each numbered paragraph below responds to the corresponding number in the Amended Complaint (Dkt. 137).

1. Defendant admits the allegations in this paragraph.
2. Defendant admits the allegations in this paragraph.
3. Defendant admits the allegations in this paragraph.
4. Defendant admits that SB 1 takes particular aim at voters with disabilities and voters with limited English proficiency, who are overwhelmingly voters of color. Defendant lacks

knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

5. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
6. Defendant admits the first sentence of this paragraph. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in the second sentence of this paragraph. Defendant admits that plaintiffs seek judicial relief under the Voting Rights Act, the Civil Rights Act, the Americans with Disabilities Act, Section 504 of the Rehabilitation Act, and the United States Constitution. The last sentence of this paragraph consists of legal conclusions that are not subject to admission or denial. To the extent a further response is required, Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
7. Defendant admits the allegations in this paragraph.
8. Defendant admits the allegations in this paragraph.
9. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
10. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
11. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
12. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

13. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
14. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
15. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
16. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
17. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
18. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
19. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
20. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
21. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
22. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
23. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

24. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
25. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
26. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
27. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
28. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
29. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
30. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
31. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
32. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
33. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
34. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
35. Defendant admits the allegations in this paragraph.

36. Defendant admits the first two sentences of this paragraph. Defendant lacks sufficient knowledge or information to admit or deny the third sentence of this paragraph.
37. Defendant admits that election authorities can use the forms the SOS provides but denies that they are required to use only these particular forms. Defendant admits the remaining allegations in this paragraph.
38. Defendant admits the allegations in this paragraph.
39. In response to the first sentence of this paragraph, Defendant admits that the SOS routinely collaborates with the Attorney General, but denies that the Attorney General can enforce criminal election laws. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in the second, third and fourth sentence in this paragraph. Defendant admits the allegation in the last sentence in this paragraph.
40. Defendant admits the allegations in the first sentence of this paragraph. Defendant denies that the AG is empowered to enforce Texas criminal laws, including the provisions in the Election Code. Defendant admits that the AG has relied on Section 273.021 in the past for independently prosecuting purported criminal offenses arising out of the Election Code, but denies that he has the authority to do so.
41. Defendant admits that the AG has sought to criminally prosecute violations of the Election Code, but denies that he has the authority to do so.
42. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
43. Defendant denies that the AG has authority to criminally prosecute violations of the Election Code, but admits the remaining allegations in this paragraph.

44. Defendant denies that the AG has authority to criminally prosecute violations of the Election Code, but admits the remaining allegations in this paragraph.
45. Defendant admits the allegations in this paragraph.
46. Defendant admits the allegations in this paragraph.
47. The allegations in this paragraph consist of legal conclusions that are not subject to admissions or denial. To the extent a further response is required, Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.
48. Defendant admits the allegations in this paragraph.
49. The allegations in the first and second sentences of this paragraph consist of legal conclusions that are not subject to admission or denial. To the extent a further response is required, Defendant lacks knowledge or information sufficient to form a belief as to the allegations in the first and second sentences of this paragraph. Defendant admits the remaining allegations in this paragraph.
50. The allegations in this paragraph consist of legal conclusions that are not subject to admission or denial. To the extent a further response is required, Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
51. Defendant admits the allegations in this paragraph.
52. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
53. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
54. Defendant admits the allegations in this paragraph.

- 55. Defendant admits the allegations in this paragraph.
- 56. Defendant admits the allegations in this paragraph.
- 57. Defendant admits the allegations in this paragraph.
- 58. Defendant admits that Texas legislators and officials have repeatedly used the justification of voter fraud as a pretext to justify discriminatory laws. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.
- 59. Defendant admits that Texas was covered by preclearance. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.
- 60. Defendant admits the allegations in this paragraph.
- 61. Defendant admits the allegations in this paragraph.
- 62. Defendant admits the allegations in this paragraph.
- 63. Defendant admits that, in 2019, Harris County entered into a settlement agreement with the Department of Justice regarding the accessibility of polling places. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in the paragraph.
- 64. Defendant admits that Texas has restrictive voting laws, and that history shows that the burdens of restrictive voting laws fall most heavily on voters of color, voters with disabilities, voters with limited English proficiency, and young and first-time voters. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.
- 65. Defendant admits the allegations in this paragraph.
- 66. Defendant admits the allegations in this paragraph.

- 67. Defendant denies that Texas closed polling places between 2012 and 2019. Defendant admits the remaining allegations in this paragraph.
- 68. Defendant admits the allegations in the first sentence of this paragraph. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.
- 69. Defendant admits the allegations in this paragraph.
- 70. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
- 71. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
- 72. Defendant admits the allegations in this paragraph.
- 73. Defendant admits the allegations in this paragraph.
- 74. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
- 75. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
- 76. Defendant admits the allegations in this paragraph.
- 77. Defendant admits that Harris County took measures to increase voter participation, including the extension of early voting hours, access to drive-thru voting, and education about and easier access to forms for voters eligible to vote by mail. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in the first sentence of this paragraph. The second sentence of this paragraph consists of legal conclusions that are not subject to admission or denial.

78. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
79. Defendant admits the allegations in this paragraph.
80. Defendant admits the allegations in this paragraph.
81. Defendant admits the allegations in the first and second sentences of this paragraph. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.
82. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in the second and third sentences of this paragraph. Defendant admits the remaining allegations in this paragraph.
83. Defendant admits the allegations in this paragraph.
84. Defendant admits the allegations in this paragraph.
85. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in the second sentence of this paragraph. Defendant admits the remaining allegations in this paragraph.
86. Defendant admits the allegations in this paragraph.
87. Defendant admits the allegations in the first sentence of this paragraph. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.
88. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
89. Defendant admits the allegations in this paragraph.
90. Defendant admits the allegations in this paragraph.

91. Defendant admits that plaintiffs challenge the sections of SB 1 enumerated in this paragraph.
92. Defendant admits the allegations in this paragraph.
93. Defendant admits the allegations in this paragraph.
94. Defendant denies that Sections 5.06 or 5.10 require the information stated in this paragraph, or that any of the listed sections contain requirements regarding carrier envelopes. Defendant admits the remaining allegations in this paragraph.
95. Defendant admits the allegations in this paragraph.
96. Defendant admits the allegations in this paragraph.
97. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
98. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
99. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
100. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
101. Defendant admits the allegations in this paragraph.
102. Defendant admits the allegations in this paragraph.
103. Defendant admits the allegations in this paragraph.
104. Defendant admits the allegations in this paragraph.
105. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

106. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in the last sentence of this paragraph. Defendant admits the remaining allegations in this paragraph.
107. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
108. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph
109. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
110. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
111. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
112. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
113. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
114. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
115. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
116. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

117. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.
118. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
119. Defendant admits the allegations in this paragraph.
120. The allegations in this paragraph consist of legal conclusions that are not subject to admission or denial. To the extent a further response is required, Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
121. The allegations in this paragraph consist of legal conclusions that are not subject to admission or denial. To the extent a further response is required, Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
122. The allegations in this paragraph consist of legal conclusions that are not subject to admission or denial. To the extent a further response is required, Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
123. Defendant admits that Plaintiffs request injunctive relief and attorneys' fees and costs. Defendant denies that Plaintiffs are entitled to seek attorneys' fees or costs from Defendant Longoria.
124. Defendant admits the allegations in this paragraph.
125. Defendant admits the allegations in this paragraph.
126. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
127. Defendant admits the first sentence of this paragraph. The allegations in the second sentence of this paragraph consist of legal conclusions that are not subject to admission or

denial. To the extent a further response is required, Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

128. Defendant admits the first sentence of this paragraph. The remaining allegations in this paragraph consist of legal conclusions that are not subject to admission or denial. To the extent a further response is required, Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

129. Defendant admits the first sentence of this paragraph. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

130. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

131. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

132. Defendant admits the allegations in this paragraph.

133. Defendant denies that her actions have caused Plaintiffs any harm. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

134. Defendant admits that Plaintiffs request injunctive relief and attorneys' fees and costs. Defendant denies that Plaintiffs are entitled to seek attorneys' fees or costs from Defendant Longoria.

135. Defendant admits the allegations in this paragraph.

136. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

137. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
138. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
139. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
140. Defendant denies that she will discriminate against the Plaintiffs or any other voters. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
141. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
142. Defendant admits that plaintiffs request injunctive relief and attorneys' fees and costs. Defendant denies that Plaintiffs are entitled to recover attorneys' fees or costs from Defendant Longoria.
143. The allegations in this paragraph consist of legal conclusions that are not subject to admission or denial. To the extent a further response is required, Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
144. Defendant admits the allegations in this paragraph.
145. Defendant admits the allegations in this paragraph.
146. Defendant admits the allegations in this paragraph.
147. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
148. Defendant admits the allegations in this paragraph.

- 149. Defendant admits the allegation in this paragraph.
- 150. Defendant admits the allegations in this paragraph.
- 151. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
- 152. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
- 153. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
- 154. Defendant admits the allegations in this paragraph.
- 155. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
- 156. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
- 157. Defendant admits the allegations in this paragraph.
- 158. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
- 159. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
- 160. Defendant admits the allegation in the first sentence of this paragraph. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.
- 161. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

162. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
163. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
164. Defendant denies that she has excluded or continues to exclude Plaintiffs or other voters from participation in voting or denied Plaintiffs benefits or discriminated against them. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.
165. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
166. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
167. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
168. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
169. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
170. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
171. Defendant admits the allegations in this paragraph.
172. Defendant admits the allegations in this paragraph.

173. The allegations in this paragraph consist of legal conclusions that are not subject to admission or denial. To the extent a response is required, Defendant admits the allegations regarding the broad interpretation of assistance with voting set out in the VRA and lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.
174. The allegations in this paragraph consist of legal conclusions that are not subject to admission or denial. To the extent a further response is required, Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
175. Defendant admits the allegations in this paragraph.
176. Defendant admits that plaintiffs request injunctive relief and attorneys' fees and costs. Defendant denies that Plaintiffs are entitled to seek attorneys' fees or costs from Defendant Longoria.
177. Defendant admits the allegations in this paragraph.
178. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
179. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
180. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
181. Defendant denies that her actions have caused Plaintiffs any harm. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

182. Defendant admits that Plaintiffs request injunctive relief and attorneys' fees and costs. Defendant denies that Plaintiffs are entitled to recover attorneys' fees or costs from Defendant Longoria.
183. Defendant admits the allegations in this paragraph.
184. The allegations in this paragraph consist of legal conclusions that are not subject to admission or denial. To the extent a further response is required, Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
185. Defendant denies that she has failed to meet any obligations to provide Plaintiffs or other voters with disabilities an opportunity to vote that is equal to the opportunity provided to voters without disabilities. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.
186. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
187. Defendant denies that her actions have caused Plaintiffs any harm. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.
188. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
189. Defendant admits that Plaintiffs request injunctive relief and attorneys' fees and costs. Defendant denies that Plaintiffs are entitled to seek attorneys' fees or costs from Defendant Longoria.
190. Defendant admits the allegations in this paragraph.

191. Defendant admits that SB 1 violates the First Amendment to the United States Constitution. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.
192. Defendant admits that SB 1 violates the First Amendment to the United States Constitution. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.
193. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
194. Defendant admits the allegations in this paragraph.
195. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
196. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.
197. Defendant admits that SB 1 vaguely defines “benefit” as “anything reasonably regarded as a gain or advantage.” Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.
198. Defendant admits the allegations in this paragraph.
199. Defendant admits the allegations in the first and second sentences of this paragraph. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.
200. Defendant admits the allegations in this paragraph.
201. Defendant admits the allegations in this paragraph.
202. Defendant admits the allegations in this paragraph.

- 203. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
- 204. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
- 205. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
- 206. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
- 207. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
- 208. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
- 209. Defendant admits the allegations in this paragraph.
- 210. Defendant admits the allegations in this paragraph.
- 211. Defendant admits that Section 7.04's prohibition on so-called "vote harvesting" is unconstitutionally overbroad. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.
- 212. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
- 213. Defendant admits that the so-called "vote harvesting" provision of SB 1 is unconstitutionally overbroad. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

- 214. Defendant admits that Section 7.04 of S.B.1 regulates a substantial amount of constitutionally protected expression and is unconstitutionally overbroad.
- 215. The allegations in this paragraph consist of legal conclusions that are not subject to admission or denial. To the extent a further response is required, Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
- 216. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
- 217. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
- 218. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
- 219. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
- 220. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph
- 221. Defendant admits the allegations in this paragraph.
- 222. Defendant admits the allegations in this paragraph.
- 223. Defendant admits that the provision banning ballot collection is vague. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.
- 224. Defendant admits that the provision banning ballot collection is vague. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

- 225. Defendant admits that the provision banning ballot collection is vague. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.
- 226. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
- 227. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
- 228. Defendant admits the allegations in this paragraph.
- 229. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
- 230. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
- 231. Defendant admits the allegations in this paragraph.
- 232. Defendant admits the allegations in this paragraph.
- 233. Defendant admits that Section 7.04 of SB 1 is unconstitutionally vague in violation of the Due Process Clause and the First Amendment.
- 234. Defendant admits that Plaintiffs request injunctive relief and attorneys' fees and costs. Defendant denies that Plaintiffs are entitled to seek attorneys' fees or costs from Defendant Longoria.

Respectfully submitted,

/s/ Sameer S. Birring_____

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Attorneys for Defendant ISABEL

LONGORIA, in her Official Capacity as

Harris County Elections Administrator

^ Application for admission pending

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on December 15, 2021, in compliance with the Federal Rules of Civil Procedure to all counsel of record via the CM/ECF filing system.

/s/ Sameer S. Birring
Sameer S. Birring